

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

IN RE: JOHNSON & JOHNSON TALCUM
POWDER PRODUCTS MARKETING, SALE
PRACTICES, AND PRODUCTS LIABILITY
LITIGATION

MDL No. 2738 (FLW) (LHG)

This Document Relates to:

Alexis Conley v. Johnson & Johnson, et al.
Case No. 3:18-11677

MOTION TO WITHDRAW APPEARANCE AS COUNSEL

Pursuant to Local Rule 102.1, undersigned counsel, Jessica H. Meeder, hereby moves this Court for leave to withdraw as counsel for Plaintiff Alexis Conley (“Plaintiff”) because undersigned counsel has no attorney-client relationship with Plaintiff, her appearance serves no meaningful purpose, and because counsel for Plaintiff has represented that they will enter their appearance on her behalf within 45 days. In support thereof, Counsel states as follows:

1. Plaintiff Alexis Conley retained the law firm of Murphy, Falcon & Murphy (“MFM”) and others to represent her. She is represented by and has an attorney-client relationship with MFM.
2. Attorney Meeder was an attorney with MFM until October 2019. In her capacity as an employee of MFM, she filed the above-captioned case on behalf of Plaintiff and MFM client Alexis Conley.
3. Attorney Meeder left MFM in October 2019 to work for another law firm. Plaintiff remained a client of MFM.
4. Attorney Meeder has not represented Ms. Conley since October 2019 and currently does not represent her. She has no attorney-client relationship with Ms. Conley.

5. Since her departure, Attorney Meeder has made significant but ultimately unsuccessful efforts to secure substitution of her appearance in this matter by an attorney who actually represents Ms. Conley.

6. Pursuant to today's filing by attorneys from Murphy, Falcon & Murphy on behalf of Ms. Conley (Dkt. 9), Attorney Meeder understands that MFM will substitute her appearance within 45 days. However, Ms. Meeder is unaware of any reason why such substitution cannot occur imminently, particularly given MFM counsel's ECF access and recent filing.

7. Because Attorney Meeder does not have an attorney-client relationship with Plaintiff Conley, her appearance in this matter serves no meaningful purpose. *See Ohntrup v. Firearms Center, Inc.*, 802 F.2d 676, 680 (3d Cir. 1986) (permitting an attorney to withdraw once they "demonstrate[] to the satisfaction of the district court that [their] appearance serves no meaningful purpose..."). Accordingly, the Court should permit Attorney Meeder to withdraw her appearance as Ms. Conley's counsel of record.

WHEREFORE, for the reasons stated above, Counsel respectfully requests that the Court enter an Order permitting Counsel to withdraw from representation of Plaintiff Conley, and for such other relief as the Court deems appropriate.

Dated: December 4, 2020

Respectfully Submitted,

/s/ Jessica H. Meeder

Jessica H. Meeder

jessica@feganscott.com

FEGAN SCOTT LLC

1200 G St. NW, Suite 800

Washington, D.C. 20005

Telephone: 202-921-6007

Facsimile: 312-264-0100

CERTIFICATE OF SERVICE

I hereby certify that on December 4, 2020, I electronically filed the foregoing using the Court's electronic filing system, which will notify all counsel of record authorized to receive such filings. I also sent the foregoing via electronic mail to the following:

Nicholas Szokoly, Esq.
Nikoletta Mendrinos, Esq.
Murphy, Falcon & Murphy
1 South Street, 30th Floor
Baltimore, Maryland 21202
Telephone: 410-951-8744
Facsimile: 410-539-6599
Nick.szokoly@murphyfalcon.com
Nikoletta.mendrinos@murphyfalcon.com

Dated: December 4, 2020

/s/ Jessica H. Meeder
Jessica H. Meeder